

BSO/lmt

82-82153

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
ADRIAN SCHOOLCRAFT,

Plaintiff,

-against-

10 CIV 6005 (RWS)

THE CITY OF NEW YORK, et al.,

Defendants.
-----X

**PROPOSED SPECIAL VERDICT SHEET OF DEFENDANT
JAMAICA HOSPITAL MEDICAL CENTER,**

Submitted By:

Defendant Jamaica Hospital Medical Center

William Brady, Esq.

Gregory J. Radomisli, Esq.

Brian Osterman, Esq.

MARTIN CLEARWATER & BELL, LLP.

220 East 42nd Street

New York, NY 10017

1. Did the defendant Jamaica Hospital, by its agent and employees, depart from accepted standards of medical practice by involuntarily admitting the plaintiff Adrian Schoolcraft to the Psychiatric Emergency Department at Jamaica Hospital?

Yes _____ No _____

If Yes, proceed to Question 2. If No, proceed to Question 3.

2. Was the departure on the part of the defendant Jamaica Hospital a substantial factor in causing personal injuries to the plaintiff Adrian Schoolcraft?

Yes _____ No _____

3. Did the defendant Dr. Isak Isakov depart from accept standards of medical practice by involuntarily admitting the plaintiff Adrian Schoolcraft to Jamaica Hospital?

Yes _____ No _____

If Yes, proceed to Question 4. If No, proceed to Question 5.

4. Was the departure on the part of the defendant Dr. Isak Isakov a substantial factor in causing personal injuries to the plaintiff Adrian Schoolcraft?

Yes _____ No _____

5. Did the defendant Dr. Aldana-Bernier depart from accepted standards of medical practice by involuntarily admitting the plaintiff Adrian Schoolcraft to Jamaica Hospital?

Yes _____ No _____

If Yes, proceed to Question 6. If No, proceed to Question 7.

6. Was the departure on the part of the defendant Dr. Aldana-Bernier a substantial factor in causing personal injuries to the plaintiff Adrian Schoolcraft?

Yes _____ No _____

If you have answered Yes to either Question 2, 4 or 6, proceed to Question 7. If you have not answered Yes to either Question 2, 4 or 6, then report your verdict to the Court.

7. If you find that any of the above-named defendants were responsible personal injuries sustained by the plaintiff Adrian Schoolcraft, (by answering Yes to either Question 2, 4 or 6), please answer the following questions

(1) Set forth the total amount of damages sustained by the plaintiff Adrian Schoolcraft from October 31, 2009 to the date of your verdict for:

(a) Pain and suffering: \$ _____

If your answer to this question is zero, then insert the word, "None."

(2) Set forth the total amount of damages sustained by the plaintiff Adrian Schoolcraft from the date of your verdict into the future for:

(a) Pain and suffering: \$ _____

If your answer to either question is zero, then insert the word, "None" for that item of damage.

(3) Set forth the number of years that the plaintiff Adrian Schoolcraft will sustain future damages.

_____ Years

8. Did the plaintiff Adrian Schoolcraft's conduct on October 31, 2009 leading up to his admission to Jamaica Hospital contribute to his being retained and admitted to Jamaica Hospital?

Yes _____ No _____

If Yes, proceed to Question 9. If No, proceed to Question 10.

9. Was the plaintiff Adrian Schoolcraft's conduct a substantial factor in causing his own injuries?

Yes _____ No _____

10. State the percentage by which each party contributed to the plaintiff Adrian Schoolcraft's injuries. If a party did not contribute to the plaintiff's injuries, then insert the word "None" next to the party's name.

Jamaica Hospital _____ %

Dr. Isak Isakov _____ %

Dr. Aldana-Bernier _____ %

Adrian Schoolcraft _____ %

The total of the percentages must equal 100%

This is a preliminary proposed jury verdict sheet that is being submitted prior to trial as per the Court's rules. The defendant Jamaica Hospital reserves the right to change or supplement the proposals based on the evidence presented at trial.

Dated: New York, New York
October 29, 2015

Respectfully submitted,

MARTIN CLEARWATER & BELL LLP

By: 

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To: All Parties via ECF